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13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA

15 SAN FRANCISCO DIVISION

16 GOOGLE LLC,

17 Plaintiff,

18 vs.

19 SONOS, INC.,

20 Defendant.

CASE NO. 3:20-cv-06754-WHA

Related to CASE NO. 3:21-cv-07559-WHA

**DECLARATION OF JOCELYN MA IN
SUPPORT OF GOOGLE LLC'S
ADMINISTRATIVE MOTION TO SEAL
PORTIONS OF ITS MOTION FOR
SUMMARY JUDGMENT**

I, Jocelyn Ma, declare and state as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at Quinn Emanuel Urquhart & Sullivan LLP representing Google LLC (“Google”) in this matter. I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.

2. I make this declaration in support of Google’s Administrative Motion to File Under Seal Portions of its Motion for Summary Judgment (“Motion”). If called as a witness, I could and would testify competently to the information contained herein.

3. Google seeks an order sealing the materials as listed below:

Document	Portions to Be Filed Under Seal	Designating Party
Google’s Motion	Portions highlighted in yellow and green and outlined in red boxes	Google and Sonos
Exhibit 1 (January 23, 2023 Reply Report of Dr. Dan Schonfeld Regarding U.S. Patent No. 10,848,885 and U.S. Patent No. 10,469,966)	Portions outlined in red boxes	Google and Sonos
Exhibit 2 (January 23, 2023 Reply Expert Report of Dr. Kevin C. Almeroth)	Portions outlined in red boxes	Google and Sonos
Exhibit 5 (January 13, 2023 Rebuttal Expert Report of Dan Schonfeld, Ph.D.)	Portions outlined in red boxes	Google
Exhibit 11 (November 30, 2022 Opening Expert Report of Samrat Bhattacharjee Regarding Invalidity of U.S. Patent Nos. 10,779,033 and 9,967,615 and Other Issues)	Portions outlined in red boxes	Google
Exhibit 12 (January 23, 2023 Reply Expert Report of Samrat Bhattacharjee Regarding Non-Infringement of U.S. Patent No. 10,779,033 and Other Issues)	Portions outlined in red boxes	Google
Exhibit 14 (January 13, 2023 Rebuttal Expert Report of Douglas C. Schmidt)	Entire document	Google
Exhibit 17 (Transcript from the January 6, 2023 Deposition of Janos Levai)	Entire document	Google
Exhibit 18 (Document bearing starting bates number GOOG-SONOSNDCA-00075593)	Entire document	Google

Exhibit 19 (Transcript from the February 2, 2023 Deposition of Douglas Schmidt)	Portions outlined in red boxes	Google
Exhibit 21 (January 13, 2023 Rebuttal Expert Report of Samrat Bhattacharjee Regarding Non-Infringement of U.S. Patent No. 10,779,033 and Other Issues)	Portions outlined in red boxes	Google
Exhibit 22 (Document bearing starting bates number GOOG-SONOSWDTX-00041617)	Entire document	Google

4. Exhibits 14, 17, 18, and 22 contain references to Google's confidential business information and trade secrets, including details regarding source code, architecture, and technical operation of Google's products and functionalities that Sonos accuses of infringement. The specifics of how these functionalities operate is confidential information that Google does not share publicly. Thus, public disclosure of such information could lead to competitive harm to Google as competitors could use these details regarding the architecture and functionality of Google's products to gain a competitive advantage in the marketplace with respect to their competing products. I also understand that a less restrictive alternative than sealing these exhibits would not be sufficient because the information sought to be sealed is Google's confidential business information and trade secrets but is necessary to Google's Motion.

5. The portions highlighted in yellow and outlined in red boxes in Google's Motion and Exhibits 1, 2, 5, 11, 12, 19, and 21 also contain references to Google's confidential business information and trade secrets, including details regarding source code, architecture, and technical operation of Google's products and functionalities that Sonos accuses of infringement. The specifics of how these functionalities operate is confidential information that Google does not share publicly. Thus, public disclosure of such information could lead to competitive harm to Google as competitors could use these details regarding the architecture and functionality of Google's products to gain a competitive advantage in the marketplace with respect to their competing products. I also understand that a less restrictive alternative than sealing these exhibits would not be sufficient because the information sought to be sealed is Google's confidential business information and trade secrets but is necessary to Google's Motion.

1 I declare under penalty of perjury under the laws of the United States of America that to the
2 best of my knowledge the foregoing is true and correct. Executed on February 6, 2023, in San
3 Francisco, California.

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5 DATED: February 6, 2023

6 By: /s/ Jocelyn Ma
7 Jocelyn Ma
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ATTESTATION

I, Charles K. Verhoeven, am the ECF user whose ID and password are being used to file the above Declaration. In compliance with Civil L.R. 5-1, I hereby attest that Jocelyn Ma has concurred in the aforementioned filing.

DATED: February 6, 2023

/s/ Charles K. Verhoeven

Charles K. Verhoeven